#### IN THE UNITED STATES DISTRICT COURT

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### FOR THE SOUTHERN DISTRICT OF NEW YORK

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JASON GOODMAN

Case

Case No.: 1:21-cv-10878-AT-JLC

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vs.

REQUEST FOR JUDICIAL NOTICE

 $_{7}\parallel_{C}$ 

CHRISTOPHER ELLIS BOUZY, BOT SENTINEL, INC, GEORGE WEBB SWEIGERT, DAVID GEORGE SWEIGERT, BENJAMIN WITTES, NINA JANKOWICZ, ADAM SHARP, MARGARET ESQUENET, THE ACADEMY OF TELEVISION ARTS AND SCIENCES, SETH BERLIN,

Plaintiff,

11 AND SCIENCES, SETH MAXWELL MISHKIN,

Defendants

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Plaintiff Jason Goodman, by and for himself pro se, respectfully submits this request for judicial notice.

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REQUEST FOR JUDICIAL NOTICE-1

Defendant David George Sweigert ("Sweigert") persists in his unrelenting efforts to interfere with the outcome of this case inappropriately and even illegally. On or around April 21, 2023, Goodman submitted a request for a subpoena to the court (ECF No. 189). The subpoena is directed at Twitter, Inc. and seeks "all direct messages (DM) sent or received to or from the Twitter accout https://twitter.com/richaf\_loury28 ("@richaf\_loury28) from March 2014 - June 22, 2021". This account is believed to be associated with Richard Loury ("Loury") a clerk of the court in the Eastern District of Michigan ("MIED") who Goodman alleges conspired with defendant Sweigert and his brother George Webb Sweigert ("Webb") to forge and file a document intended to affect the outcome of Sweigert v Cable

News Network in a manner calculated to harm Goodman. (EXHIBIT A)

Proving or disproving this allegation is relevant to Goodman's claims that Sweigert has coordinated and participated in ongoing and related racketeering activity calculated to harm Goodman. At or around 11:17am on April 21, 2023, after he bacame aware of this subpoena to Twitter, Sweigert sent an email alerting Loury. (EXHIBIT B)

This is not the first time Sweigert has inappropriately assisted a non-party or another litigant with the express intent of harming Goodman. On information and belief, Goodman alleges Sweigert sent this email to warn Loury so that he could destroy any incriminating evidence that might exist. Whether that action is carried out or not, this message should be construed as Sweigert inciting Loury to spoliate evidence.

Sweigert must be enjoined from interfering with this and other legal actions involving Goodman. The defendants should be compelled to appear at an in person hearing where they should be compelled to answer questions about this evidence under oath.

Signed this 21st day of April 2023

Respectfully submitted,

Jason Goodman, Plaintiff, Pro Se 252 7<sup>th</sup> Avenue Apt 6s New York, NY 10001 (323) 744-7594

truth@crowdsourcethetruth.org

**REQUEST FOR JUDICIAL NOTICE-2** 

## (EXHIBIT A)

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF MICHIGAN

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4 5 GEORGE SWEIGERT

Plaintiff,

Defendant

CABLE NEWS NETWORK, INC.,

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VS.

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Case No.: 20-cv-12933-GAD-KGA

MOTION SEEKING LEAVE TO FILE AMENDED AMICUS CURIAE BRIEF

Jason Goodman, pro se non-attorney, non-party to this case comes now as a friend of the Court seeking leave to file an amended Amicus Curiae brief including newly discovered, prima facie evidence of a conspiracy to commit fraud on the Court and defendant Cable News Network, Inc. ("CNN"). This fraud was aimed directly at the "judicial machinery" with the intention of disrupting the impartiality of the Court substantially preventing it from performing its tasks without bias or prejudice. The Amicus Curiae brief attached hereto contains new empirical evidence that is likely to prove that Plaintiff conspired with an officer of the Court and other third parties to commit this fraud in violation of Michigan penal code Section 750.248(1) and with the intention of affecting the outcome of this and other cases in U.S. District Courts in other states. Goodman has a unique perspective on these empirical facts that are necessary for the Court to consider in the proper service of justice in this matter.

Signed this 14th day of March 2022

Jason Goodman, Amicus Curiae, Pro Se 252 7th Avenue Apt 6s

New York, NY 10001 (323) 744-7594

truth@crowdsourcethetruth.org.

MOTION SEEKING LEAVE TO FILE AMENDED AMICUS CURIAE BRIEF - 1

# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

George Webb Sweigert,

Plaintiffs,

v.

Cable News Network, Inc.,

Defendants.

Case No. :20-cv-12933-GAD-KGA

Honorable Gershwin A. Drain

# AMENDED BRIEF OF AMICUS CURIAE JASON GOODMAN IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS

Jason Goodman
252 7<sup>th</sup> Avenue #6s
New York, NY 10001
(323) 744-7594
truth@crowdsourcethetruth.org
Pro Se

Robin Luce Herrmann (P46880) Jennifer A. Dukarski (P74257) Javon R. David (P78214) BUTZEL LONG, a professional corporation Attorneys for Defendant Cable

Attorneys for Defendant Cable News

Network, Inc.

41000 Woodward Avenue

Stoneridge West

Bloomfield Hills, MI 48304 (248)

258-1616

Luce-Herrmann@butzel.com

Dukarski@butzel.com

<u>Davidi@butzel.co</u>m

#### AMICUS CURIAE BACKGROUND AND INTEREST IN THE CASE

Jason Goodman ("Goodman") is a non-attorney and non-party to this case. He is the creator of internet-based news, opinion, and entertainment talk show Crowdsource the Truth. Since 2017, Goodman has been the target of cyber harassment, cyber stalking and five separate vexatious lawsuits brought about by family members and other associates of the plaintiff in this instant action. Goodman is a journalist, cinematographer, and former Hollywood visual effects expert. He is a software applications specialist with 36 years of experience in computer graphics imaging and an expert knowledge in a wide range of file formats including Joint Photographic Experts Group (JPEG) and Adobe Portable Document Format (PDF). For a period of approximately three months during 2017, Goodman collaborated with Webb on a series of video productions. Since then, Goodman has been the target of vexatious litigation emanating from the plaintiff, his brother, and their various associates. Goodman comes now as a friend of the court to share empirical evidence from the Court's own docket that is likely to prove the plaintiff and others conspired with at least one officer of the Court to make material misrepresentations and directly attack the judicial machinery with malicious intent so significant as to prevent the Court's performance of judicial tasks without bias or prejudice. Plaintiff and his co-conspirators acted in violation of Michigan penal code section 750.248(1) which states "A person who falsely makes, alters, forges, or counterfeits a public record, or a certificate, return, or attestation of a clerk of a court, or other property with intent to injure or defraud another person is guilty of a felony punishable by imprisonment for not more than 14 years." This illicit conspiracy made multiple forged filings under penalty of perjury with the intent to abuse the legal process, deceive the Court, defraud the defendant, and improperly involve Goodman in frivolous litigation. Goodman seeks to end the plaintiff's abuse of the U.S. District Court system and the perpetual

plague of ongoing frivolous litigation against him. Goodman has a unique perspective on the facts and evidence described herein. The proper service of justice requires the Court to fully review the evidence in this Amicus Curiae brief before rendering a final decision in this matter.

#### PARTIES AND NON-PARTIES

George Webb Sweigert ("Webb") is the pro se plaintiff in this matter. Webb is not an attorney, has no legal training and has a history of filing defective, frivolous pro se cases that get dismissed; See George Sweigert v. John Podesta, et al, SWEIGERT et al v. PEREZ et al, SWEIGERT et al v. PODESTA et al, SWEIGERT v. MCCABE et al.

Cable News Network, Inc. ("CNN") is the defendant in this matter, an internationally recognized news organization that has published multiple reports highly critical of Webb.

Non-party David George Sweigert ("David") is Webb's brother (hereinafter collectively referenced as "Sweigert Brothers" or "Sweigerts"). David is not admitted to the Bar but, by his own admission has attended one semester of law school. Since 2017, David has drafted thousands of pages and made hundreds of frivolous filings in an aggressive, continuous, and ongoing campaign to harass Goodman and disrupt his ability to conduct business. David is also a retired Air Force IT specialist, professional hacker, social engineer, and author of The Ethical Hacker's Field Operations Guide (https://drive.google.com/file/d/1BeVtzd7TKGpMvNonaUdD-Ls2RIGJm7JM/view?usp=sharing). The book is a detailed manual that describes tactics and methods for sending and receiving clandestine messages, penetrating complex computer networks, and evading detection among other things.

Non-party Richard Loury ("Loury") is believed to be the Pro Se Litigation Administrator at the Court and the Author of ECF No. 12, ECF No. 14, and ECF No. 44 in Sweigert v Cable

News Network (*See* 2-20-cv-12933-GAD-KGA) as revealed by the document properties inspector of Adobe Acrobat Professional software.

Non-party Jacquelyn Weaver ("Weaver") is an associate of David and the author of a "lawfare blog" <a href="https://trackingmeroz.wordpress.com/">https://trackingmeroz.wordpress.com/</a>. Weaver's blog is used to publish and amplify false claims made by David in privileged legal filings against Goodman. It is also an indexed library of every case against Goodman and includes theory, commentary and case law citations used by David in harassing litigation. Weaver is a de facto "ghost paralegal" for David and has conspired with him to harass Goodman in multiple U.S. District Courts. Weaver is not an attorney and has no legal authority to draft briefs for litigants other than herself.

#### STATEMENT OF FACTS

On October 31, 2020, Webb filed a defective, time barred defamation claim against Cable News Network ("Webb v CNN") in the Eastern District of Michigan ("MIED"). Less than one week later, Webb's brother David moved to intervene and change the venue to the Southern District of New York ("SDNY"). As Plaintiff in Sweigert v Goodman, (See 1:18-cv- 08653-VEC-SDA SDNY 2018) David sued Goodman for more than three years making a wide range of frivolous claims that evolved dramatically over time. On March 1, 2022, the case was voluntarily dismissed for no stated reason. Since then, filing activity in this instant action and in Sweigert v Goodman (See 2:22-cv-10002-GAD-KGA MIED 2022) has increased dramatically. David was admonished by judge Valerie Caproni (SDNY) for his frequent, duplicative, and frivolous filings. Now with that case concluded, coincidentally, this identical pattern of activity has emerged here. On information and belief, Goodman alleges David is ghost writing and filing pleadings falsely claiming to be Webb, with the assistance of Loury, Weaver and possibly others.

Goodman first became acquainted with the Sweigert Brothers in 2017. Since then, he has become the target of five separate civil lawsuits in which one or both brothers have been directly involved. Goodman alleges these cases were deliberately brought about and aggravated by the Sweigerts for an improper purpose to harass Goodman and extort money from him. In addition to suing Goodman, David has attempted to intervene in or otherwise inappropriately interfere with every one of the actions against Goodman and has publicly vowed to sue Goodman for the rest of his life for no stated reason. On information and belief, Goodman alleges the Sweigert Brothers conceived of Webb v CNN for the inappropriate purpose of involving Goodman strictly to harass him and extort money. Goodman further alleges the Sweigert Brothers conspired with Loury and Weaver to improperly draft and file pleadings on behalf of Webb and to abuse and deceive the Court in an illicit effort to turn it into their own personal weapon against Goodman.

#### EVIDENCE OF IMPROPER FILINGS ON THE ECF DOCKET

The document properties inspector of Adobe Acrobat Professional Software reveals that ECF No. 12, ECF No. 14 and ECF No. 44 were each authored by "RichardLoury", not pro se Plaintiff Webb as signed and sworn to under penalty of perjury. **(EXHIBIT A)**.

#### ECF No. 11 and ECF No. 12

The Court was previously alerted to the unexplained and improper appearance of Loury's name embedded in the internal metadata of ECF No. 12. On a telephone call, Loury's supervisor vaguely described circumstances under which Loury might interact with litigants' documents in ways that could cause his name to become associated with document metadata, however, these circumstances do not match the documents in question. ECF No. 12 is Webb's response to a show cause order that threatened to dismiss the case for failure to serve the defendant. Webb requested additional time and two summonses with which to serve CNN and its agent of record.

The Court responded affirmatively by issuing the summonses. The document properties inspector indicates the first of two responsive summonses, ECF No. 11, was created on June 21, 2021, at 8:00 am using Dotimage PDF Encoder, modified with iText 7.1.6. (EXHIBIT B)

No author is named on this document. Inexplicably, the creation date of the document shows this response came more than one hour prior to plaintiff's request for it via ECF No. 12 which was created at 9:05 am on June 21, 2021. (EXHIBIT C)

This proves that ECF No. 12 could not have been filed by Webb because the signed summons could only have been created by someone at the Court. The request from Webb would not be known by the Court until it was filed via the Temporary Pro Se Filing web page and entered on the docket. There is no logical explanation for this temporal anomaly aside from one person creating both documents and accidentally filing them out of order on the ECF docket. If Webb properly filed ECF No. 12 on the Court's Temporary Pro Se Filing page, he would be in possession of the filing receipt as would the Court. No such evidence has been presented.

After Goodman initially raised this concern in an Amicus Brief filed July 20 2021, Webb filed a new suit against Goodman claiming the allegations were defamatory. Webb's defective complaint sought a one hundred-thousand-dollar payment and to strike the claims and evidence in the Amicus brief from the record. *See* Sweigert v Goodman 22-cv-10002-GAD-KGA. Webb offers no explanation for the anomalous filing of ECF No. 12, no explanation as to how or why Loury's name could appear on his filings, and no receipt from the Court as proof of filing.

#### ECF No. 13 and ECF No. 14

ECF No. 13 is the second of two summonses issued by the Court in response to Webb's request. For no clear reason, this summons is issued the following day on June 22, 2021. It is stamped with a rubber stamp indicating the date and signed by the administrative or deputy clerk

before being entered on the docket. ECF No. 14 is the executed summons returned to the Court July 6, 2021 by Webb, signed by process server Chiquita Jackson. ECF No. 14 does not bear the rubber date stamp seen on ECF No. 13 and the clerk's signature appears in a different position on the signature line. ECF No. 14 is clearly not the same document, and the document properties inspector reveals this document was also Authored by "RichardLoury" using Adobe Acrobat Distiller 17.0 for Windows on July 6, 2021 at 11:09 am. No receipt from the Court's Temporary Pro Se filing website has been provided. No proof of USPS delivery is included with the filing. If the document were scanned and filed electronically by Webb, he should be indicated as the author and both Webb and the Court would be in possession of a pro se electronic filing receipt from the Court website. If the document were mailed and scanned at the Court, the scan should be made in 1 bit color depth (black and white only) as is standard procedure at the court. ECF No. 14 was scanned in color by "RichardLoury" according to document metadata.

#### ECF No. 44

ECF No. 44 is Webb's amended complaint. Defendant CNN has responded in opposition to the amendment and provided adequate reason to do so. The amended complaint reads like a brief drafted by a lawyer or at least someone with competence in writing legal briefs. This is a stark contrast to ECF No. 6, drafted, signed, and mailed by Webb, which reads like a non-lawyer's stream of consciousness general complaint letter and fails to form a legal claim. The document properties inspector indicates ECF No. 44 was authored by "RichardLoury" using Adobe Acrobat Distiller 17.0 for Windows. All other electronically filed documents attributed to Webb that do not bear Loury's name indicate they were created using the Skia/PDF m100 Google Docs Renderer. All documents on the ECF docket of this and other U.S. District Courts that Goodman has observed indicate they were modified using iText. This appears to be a

standardized tool used across all U.S. District Courts to add the blue stamp at the top indicating official entry on the docket and including the case number and ECF number. Adding the official Court information to documents using iText does not change the name of the original author but it does change the creation date of the document to reflect the time of the iText modification. Goodman has verified this completely consistent behavior across numerous filings in several U.S. District Courts including MIED, SDNY and EDVA.

#### FRAUD UPON THE COURT

Fraud on the court, or fraud upon the court, refers to a situation in which a material misrepresentation has been made to the Court with the intention to alter the outcome of a case or otherwise inappropriately influence the adversarial process. The term could also be used to refer to a situation in which a material misrepresentation has been made by the Court itself or an officer thereof. The overall defining requirement is that the impartiality of the Court has been disrupted so significantly that it cannot perform its tasks without bias or prejudice. Fraud on the Court can include, but may not be limited to:

- Fraud in the service of Court summons, such as withholding a court summons from an entitled party;
- Corruption or influence of a Court member or official, such as bribery;
- Judicial fraud;
- Intentionally failing to inform the parties of necessary appointments or requirements, as an effort to impede the judicial process; and/or
- Schemes considered to be unconscionable, as they attempt to deceive or make misrepresentations through the Court system.

It is important to note that fraud on the Court only involves court officials, or officers of

the court, such as judges, clerks, or court-appointed attorneys. The fraudulent activity must be

directed at the "judicial machinery" itself as is the case with the alleged conspiracy to disrupt

Webb v CNN. It would indeed be unconscionable if evidence on the public docket and in

possession of the Court could prove Webb conspired with Loury and others to falsify and file

ECF Nos. 12, 14 and 44 improperly. As Loury is an officer of the Court, any assistance given to

Webb in his case against CNN would be grossly inappropriate and would undermine the Court's

ability to properly adjudicate the matter. The Court must evaluate this evidence thoroughly in

order to serve justice and make an unbiased determination in the case.

**CONCLUSION** 

For the reasons stated in Defendant's motion to dismiss and further for the foregoing

reasons, Defendant's motion to dismiss should be granted. Additionally, Amicus Curiae

Goodman prays the court will further investigate this matter relating to a conspiracy to defraud

the Court in violation of the Michigan Penal Code Section 750.248(1) and issue whatever

remedy it deems most appropriate.

Signed this 14<sup>th</sup> day of March 2022

Respectfully submitted,

Jason Goodman, Plaintiff, Pro Se 252 7<sup>th</sup> Avenue Apt 6s

> New York, NY 10001 (323) 744-7594

> > 9

truth@crowdsourcethetruth.org

(EXHIBIT A)

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION AT DETROIT

George Webb Sweigert, : CASE

Plaintiff, : NO - 2:20-cv-12933-GAD-KGA

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V. : US DISTRICT COURT JUDGE

: Judge Gershwin A. Drain

CABLE NEWS NETWORK, INC : RESPONSE TO ORDER

: TO SHOW CAUSE

## PLAINTIFF'S RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

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## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION AT DETROIT

George Webb Sweigert, : Defendant.

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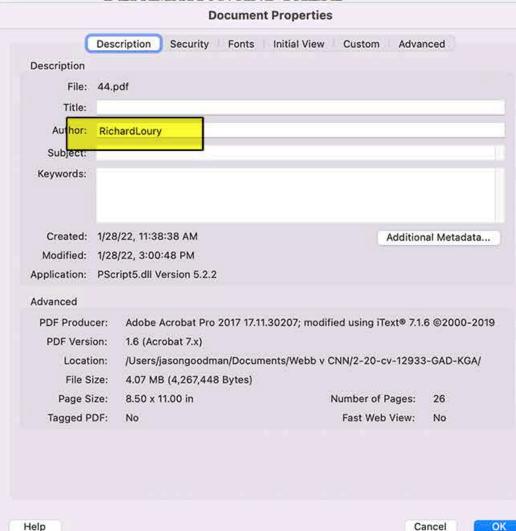
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Plaintiffs, CASE NO.2:21-cv-12933

JUDGE GERSHWIN DRAIN

PLAINTIFF'S AMENDED
COMPLAINT

## **DEFAMATION AND FALSE**



(EXHIBIT B)

# UNITED STATES DISTRICT COURT

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for the
Eastern District of Michigan

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(EXHIBIT C)

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION AT DETROIT

George Webb Sweigert, : CASE

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Plaintiff, : NO - 2:20-cv-12933-GAD-KGA

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V. : US DISTRICT COURT JUDGE

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: Judge Gershwin A. Drain

CABLE NEWS NETWORK, INC : RESPONSE TO ORDER

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: TO SHOW CAUSE

### PLAINTIFF'S I

Plaintiff hereby files th and, for the reasons s

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(EXHIBIT B)

From: Spoliation Notice spoliation-notice@mailbox.org & Subject: Re: Complaint against Colin Sullivan Bar no. 285203

Date: April 21, 2023 at 11:17 AM

To: Jason Goodman jason@21stcentury3d.com, truth@crowdsourcethetruth.org

Cc: richard\_loury@mied.uscourts.gov, spoliation@posteo.net, colin@patreon.com, legal@patreon.com, copyright@patreon.com,

George Webb Sweigert georg.webb@gmail.com, Margaret Esquenet margaret.esquenet@finnegan.com,

MaryKate.Brennan@finnegan.com, Berlins berlins@ballardspahr.com, mishkinm@ballardspahr.com, Liz Lockwood

liz.lockwood@alilockwood.com, Spoliation Notice spoliation-notice@mailbox.org, abuse@twitter.com, legal@support.youtube.com

Mr. Loury,

It appears Jason Goodman has filed a malformed subpoena for your Twitter account.

Regarding Colin Sullivan of Patreon. It would be prudent for him to respect the commands of the Court.

Best.

On 04/19/2023 2:09 PM PDT Jason Goodman < jason@21stcentury3d.com> wrote:

You know Sweigert, there is a balance to life. You cannot be the horrendous menace to the public that you are and not have the universal pendulum of karma swing back at you and deal a crushing blow. I do not need to say or do anything. You are such a horrible person, going around filing bar complaints against individuals who haven't harmed you as a regular practice just to be vindictive. The universe will conspire to continue to make your life miserable because you are miserable and all you do is propagate misery. No matter what happens in this litigation and no matter what becomes of me, you will rot in hell for the misery you bring to others here on earth. On the day you arrive there, George Henry will undoubtedly punch you right in the face and make you go to your chamber. Maybe you should request a hearing about proper etiquette in litigation correspondance so we can discuss all this with the Judge you psychotic miscreant.

On Apr 19, 2023, at 4:58 PM, Spoliation Notice <spoliation-notice@mailbox.org> wrote: Sir.

Identify the witnesses. As you say Richard Loury is a criminal. Colin Sullivan is an attorney.

Maybe you should focus on your gross errors in the Virginia legal action against you.

Best,

On 04/19/2023 11:44 AM PDT Jason Goodman < jason@21stcentury3d.com> wrote:

Cease and desist from harassing me, the witnesses and the other litigants.

On Apr 19, 2023, at 2:38 PM, Spoliation Notice <spoliation-notice@mailbox.org> wrote: Pursuant to Local Rule 26 please address me as Mr. Sweigert or sir.

As you know I am a second generation Guadacanal survivor.

Best,

On 04/19/2023 9:50 AM PDT Jason Goodman <jason@21stcentury3d.com> wrote:

Sweigert I demand you cease and desist from harassing witness, litigants and me. No action should be taken on your subpoena until the court has ruled on the motion to quash.

On Apr 19, 2023, at 12:38 PM, Spoliation Notice <spoliation-notice@mailbox.org> wrote: TO: PATREON

Clerk has just issued subpoena.

Stand by to be served.



Best,

On 04/18/2023 6:55 PM PDT Spoliation Notice < <a href="mailto:spoliation-notice@mailbox.org">spoliation-notice@mailbox.org</a> wrote:

Mr. Goodman attached is your copy.

On 04/18/2023 10:34 AM PDT Jason Goodman < jason@21stcentury3d.com > wrote:

Motion to quash David George Sweigert's vexatious subpoena filed with the court.

Sweigert discussing plans to entrap Goodman in crimes <a href="https://vk.com/video731682021\_456239118">https://vk.com/video731682021\_456239118</a> Sweigert discussing his family history of mental illness <a href="https://vk.com/video731682021\_456239020">https://vk.com/video731682021\_456239020</a> Sweigert threatening his nephew <a href="https://vk.com/video731682021">https://vk.com/video731682021\_456239017</a>

On Apr 16, 2023, at 11:07 PM, Spoliation Notice < spoliation-notice@mailbox.org > wrote:

To: San Francisco Bar Association

Please place this forwarded e-mail message in the records of the subject attorney.

Best.

----- Original Message -----

From: Spoliation Notice <spoliation-notice@mailbox.org>

To: colin@patreon.com, legal@patreon.com, disable@patreon.com

Cc: truth@crowdsourcethetruth.org, contact@unrig.net, Spoliation Notice <spoliation-notice@mailbox.org>,

feedback < feedback@calbar.ca.gov >, info < info@privacyrights.org >

Date: 11/29/2017 10:15 AM PST

Subject: Litigation hold -- Doxing and Harassement

To:

Colin Sullivan Bar no. 285203 General Counsel Patreon, Inc.

Dear Sir,

This notice requests that you begin the process of a litigation hold on all electronic evidence stored, processed or transmitted by your organization for the following account:

crowdsourcethetruth

The operator of this account is a defendant in a federal lawsuit:

Jason Goodman

This request is an evidence preservation request to prevent spoliation of electronic evidence that will be sought in federal litigation (please consult Federal Rules of Civil Procedure for guidance).

Mr. Goodman is a defendant to allegations that concern public doxing, copyright violations, harassment and hate speech. All which appear to violate the community standards policy of Patreon.

Recently, Mr. Goodman has allegedly published a series of videos on your platform that attack the privacy, physical characteristics, and intelligence of private citizens in the State of California that Mr. Goodman perceives may be friends of the plaintiff in this federal lawsuit.

Therefore, as your company holds this evidence, and as it will be required to be admitted into the court record, a strong request is hereby made that you preserve this evidence (account application, invoices, payments, video content, records of messages, transactions with Mr. Goodman, etc.).

As many of these actions allegedly violate California privacy laws, there is an increased duty to preserve these

	ds as follow-up complaints snall be lodged wit cation.	h the California Attorney General with a copy of this
	• • • • • • • • • • • • • • • • • • • •	serious consideration will be given to adding Patreon as a only will only be aiding in the distribution of the offense mate
This	s a very serious matter as law enforcement ha	as become involved.
Than	k you.	
Evide	nce Collection Team<21-cv-10878-AT-JL0	Cpdf>
Ca	ase 1:21-cv-10878-AT-JLC Docume	nt 189 Filed 04/21/23 Page 1 of 3
	abpoena to Produce Documents, Information, or Objects or to	•
	UNITED STATES D	DISTRICT COURT
	for th	
	Southern District of	f New York
	Jason Goodman	
	Plaintiff ) V.	Civil Action No. 1:21-cv-10878-AT-JLC
	R ELLIS BOUZY, BOT SENTINEL,	
INC, GEORGE V	VEBB SWEIGERT, DAVID GEORG  Defendant	
	SUBPOENA TO PRODUCE DOCUMEN OR TO PERMIT INSPECTION OF P	
To:	Twitter INC 1355 MARKET STREET	
To:	(Name of person to whom	SUITE 900 San Francisco, CA 94103  n this subpoena is directed)
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### Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).